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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

16 KELLY WILSON,

17 Plaintiff,

18 vs.

19 THE WALT DISNEY COMPANY, DISNEY
20 ENTERPRISES, INC., WALT DISNEY
21 PICTURES, and WALT DISNEY MOTION
22 PICTURES GROUP, INC.,

23 Defendants.

Case No. 3:14-cv-01441-VC

**STIPULATION AND ~~PROPOSED~~
ORDER TO MODIFY CASE
MANAGEMENT CONFERENCE,
HEARING AND RELATED DATES**

Judge: Hon. Vince G. Chhabria

1 Plaintiff Kelly Wilson (“Plaintiff”) and Defendants The Walt Disney Company; Disney
2 Enterprises, Inc.; Walt Disney Pictures, and Walt Disney Motion Pictures Group, Inc.
3 (“Defendants”), by and through their respective counsel of record, hereby declare and stipulate as
4 follows:

5 WHEREAS, on May 12, 2014 the Court ordered that a Case Management Conference will
6 be held in this case on June 27, 2014, and ordered the parties to file a Joint Case Management
7 Statement and Proposed Case Management Order no later than seven calendar days before that
8 conference;

9 WHEREAS, on June 2, 2014, Defendants moved to dismiss Plaintiff’s complaint and
10 noticed the hearing on that motion for July 10, 2014 [Docket No. 22];

11 WHEREAS, pursuant to Civil Local Rule 6-2(a)(1), the parties state that the time
12 modifications set forth below are requested for the following reason:

13 The parties have agreed to stipulate to modify the date of the hearing on the motion to
14 dismiss because Plaintiff’s counsel is unavailable on July 10, 2014, and the Court is unavailable
15 the following Thursday, July 17, 2104. The parties have further agreed to stipulate to modify the
16 date of the Case Management Conference, subject to the Court’s schedule, to combine the hearing
17 date on the motion to dismiss and the Case Management Conference.

18 WHEREAS, pursuant to Civil Local Rule 6-2(a)(2), the parties disclose that there has been
19 one previous stipulated time modification in this case (May 6, 2014 [Docket No. 16]). This
20 stipulation extended the deadline for the Defendants to answer or otherwise respond to Plaintiff’s
21 complaint; and

22 WHEREAS, pursuant to Civil Local Rule 6-2(a)(3), the parties state that the requested
23 time modifications herein will not affect any other aspect of the case schedule;

24 **ACCORDINGLY, THE PARTIES STIPULATE AS FOLLOWS:**

25 (1) The hearing on Defendants’ motion to dismiss will take place on July 24, 2014, at
26 10:00 a.m.

27 (2) The Case Management Conference will take place on July 24, 2014, concurrently
28 with the hearing on the motion to dismiss.

(3) The parties will meet and confer on the Joint Case Management Statement by July 3, 2014, and will file a Joint Case Management Statement and [Proposed] Case Management Order by July 17, 2014, seven calendar days before the Case Management Conference. Defendants will discuss with Plaintiffs the case management issues set forth in the Standing Order for all Judges of the Northern District of California, but will request that initial disclosures pursuant to Rule 26 and discovery be stayed pending resolution of the motion to dismiss, in an effort to conserve party resources. Plaintiffs will meet and confer with Defendants on such request.

(4) The deadline for Plaintiff to file a brief in opposition to Defendants' motion to dismiss is extended to June 27, 2014.

(5) The deadline for Defendants to file a reply brief in support of their motion to dismiss is extended to July 10, 2014.

IT IS SO STIPULATED.

DATED: June 6, 2014

ARIAS OZZELLO & GIGNAC LLP
J. PAUL GIGNAC
MISCHA N. BARTEAU

LAW OFFICE OF J.A. TED BAER
J.A. TED BAER

By: /s/ J. Paul Gignac

J. PAUL GIGNAC

Attorneys for Plaintiff

DATED: June 6, 2014

MUNGER, TOLLES & OLSON LLP
KELLY M. KLAUS
JORDAN D. SEGALL

By: /s/ Kelly M. Klaus

KELLY M. KLAUS

Attorneys for Defendants

1 In accordance with Local Rule 5-1(i), the filer attests that each of the above signatories
2 have concurred in the filing of this document.

3
4 DATED: June 6, 2014

By: /s/ Kelly M. Klaus

KELLY M. KLAUS

6
7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

8 Dated: June 9, 2014

By:  _____

HON. VINCE G. CHHABRIA
United States District Judge